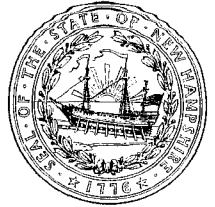




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

December 23, 2005

Mr. Stan Araszkievicz
A-Plus Finishing, Inc.
715 Pine Road
P.O. Box 966
Hudson, New Hampshire 03051

**CERTIFIED MAIL (7099 3400 0018 1290 6658)
RETURN RECEIPT REQUESTED**

**NOTICE OF PAST VIOLATION
(Sta. S)**

RE: NOTICE OF PAST VIOLATION

Dear Mr. Araszkievicz:

One November 20, 2003, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at A-Plus Finishing, Inc. ("A-Plus") in Hudson, NH. The purpose of the inspection was to determine A-Plus's compliance status with NH Administrative Rules Env-A 100 *et seq.* The purpose of this letter is to notify you of the violations discovered during the inspection and subsequent file review. The specific violations are as follows:

1. Env-A 603.01 (b) and Env-A 608.01 prohibit the operation of an existing stationary source, area source, or device without a state permit to operate issued by the DES. Env-A 608.10 requires the owner or operator of a permitted source to submit an application for renewal of that permit 90 days prior to the expiration date. Doing so entitles the source to continue operating under the application shield provided in Env-A 608.12, even if the permit expires before DES issues a new one. DES issued State Permit to Operate ("FP-S-0067") to A-Plus on December 17, 1998, which expired on December 31, 2003. A-Plus did not submit the renewal application until November 25, 2003. DES issued the renewed permit on October 31, 2005. Accordingly, A-Plus violated Env-A 603.01 and Env-A 608.12 by operating without a permit from December 31, 2003 until October 25, 2005.
2. In accordance with Env-A 1405.01 (a) *Methods of Demonstrating Compliance*, a stationary source that emits any regulated toxic air pollutant ("RTAP") any time after May 8, 2001 is required to determine compliance with the associated ambient air limits for any RTAP emitted by the source. At the time of the inspection, A-Plus had not performed a compliance determination for its RTAP emissions.

3. In accordance with Env-A 907.01 *General Reporting Requirements* and the Recordkeeping and Reporting Requirements set forth in Condition VIII of the State Permit to Operate ("FP-S-0067"), A-Plus is required to submit an annual emissions report. Emission reports submitted for calendar years 1998, 1999, and 2000 were reviewed and determined to be incomplete since the reports are missing the facility's emissions of the Volatile Organic Compounds ("VOCs") included in the following table:

Compound	CAS #
Aromatic Hydrocarbon Solvent	8032-32-4
Aromatic Naptha	64742-06-9
Butyl Cellosolve	111-76-2
Ethyl Acetate	141-78-6
Ethylene Thiourea	96-45-7
Ethylenediamine	107-15-3
PM Acetate	108-65-6
Petroleum Distillate	8002-50-9
Butyl Carbitol	112-34-5
Ethanolamine	141-43-5
Isopropyl Alcohol	67-63-0

On November 25, 2003, A-Plus submitted a permit renewal application and other relevant information necessary to correct these violations. Subsequently, on December 13, 2005, DES performed a compliance inspection to documents A-Plus's current compliance status. A-Plus was found to be in compliance at that time.

DES believes that no further action in response to the listed violations is required. The new permit was issued on October 25, 2005 and expires on October 31, 2010. A permit renewal application must be received by DES on or before August 4, 2010. DES requests that A-Plus continue to comply with all future recordkeeping and reporting obligations contained in its permit. In the event that other violations are identified, DES may take further action against A-Plus including issuing an administrative order, seeking administrative fines, and/or referring this matter to the New Hampshire Department of Justice for civil and/or criminal penalties.

If you believe that DES has cited these violations in error, or have questions regarding these matters, please contact Tara E. Olson at (603) 271-4625, Senior Enforcement Engineer, Air Resources Division. A current copy of the Air Resources Division Rules can be obtained from the DES website at <http://www.des.nh.gov/rules/air.htm>, or by contacting the DES Public Information Center at (603) 271-2975.

Sincerely,



Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

PGM/teo

cc: R. Kursowski, US EPA Region 1
G. Hamel, NHDES Legal Unit Administrator
Ken Massey, Chairman of Board of Selectmen, Hudson